

## REMARKS

This is intended as a full and complete response to the Office Action dated October 21, 2005, having a shortened statutory period for response set to expire on January 21, 2006. Please reconsider the claims pending in the application for reasons discussed below.

### ***Information Disclosure Statement***

Applicants request acknowledgement and consideration of the information disclosure statement dated October 29, 2003.

### ***Claim Objections***

Claim 86 is objected to as being dependent from itself. Applicants have amended the claim to correct its dependency. Accordingly, Applicants respectfully request withdrawal of the objection and allowance of the claim.

### ***Claim Rejections 35 U.S.C. § 102***

Claims 55-58, 67, 69, 70, 81-85, 87 and 93-95 stand rejected under 35 U.S.C. § 102(b) as being anticipated by *Simmons* (U.S. Patent No. 1,880,218). Applicants respectfully traverse the rejection. Additionally, Applicants have canceled claims 69 and 93-95 without prejudice.

Claim 55 recites that a method of running tubing into a bore to minimise differential sticking includes the limitation of identifying whether elongate members located in a selected bore are likely to encounter differential sticking. However, *Simmons* is silent regarding differential sticking. Therefore, Applicants submit that *Simmons* fails to teach, show or suggest each and every limitation of claim 55. Further, Applicants submit that claim 55 is allowable and respectfully request withdrawal of the rejection and allowance thereof.

Claim 56 recites the limitation of rotating a corrugated-walled tubular in a bore. Contrary to this rotation, well lining (reference character D) disclosed in *Simmons* is not rotated in the bore. While the Examiner states that “the corrugated tubing is rotated while being run into the well,” *Simmons* teaches that the well lining is inserted during percussive drilling, which does not involve rotation. In fact, relative rotary movement is locked (page 3, column 1, lines 39-45). Instead of turning the well lining (D) that is corrugated, a casing (E) disclosed in *Simmons* is rotated when rotary drilling is required (page 3, column 2, lines 103-114). As described at page 4, column 1, lines 6-15, the well lining (D) does not contact against the well casing (E) allowing clearance for turning of the well casing (E).

Therefore, Applicants submit that *Simmons* fails to teach, show or suggest each and every limitation of claim 56. Further, Applicants submit that claim 56 and all claims dependent thereon are allowable. Accordingly, Applicants respectfully request withdrawal of the rejection and allowance of claims 56-58.

Claim 67 has been amended to include the limitation that the corrugations are helical. The Examiner states that *Simmons* does not teach this limitation. Thus, *Simmons* cannot anticipate claim 67 and claim 70 dependent thereon. Further, Applicants additionally address this limitation previously present in claim 68 below with respect to obviousness.

Claim 81 recites the limitation of “reducing the degree of tension applied to the tubular such that the tubular axially contracts and diametrically expands.” However, the well lining disclosed in *Simmons* does not change length because the well lining is reshaped as shown in Figures 7 and 9 (or Figures 12 and 16) without causing any change in length. This reshaping does not affect the length of the well lining since the perimeter of the well lining remains constant without increasing. Since the perimeter remains constant, there is additionally no diametrical expansion of the tubing taught in *Simmons*. Further, Applicants point out that the Examiner’s statements regarding *Simmons* disclosing both “allowing the tubular to axially contract” and expanding the tubing “without the tubing substantially changing its length” are in contradiction.

Therefore, Applicants submit that *Simmons* fails to teach, show or suggest each and every limitation of claim 81. Further, Applicants submit that claim 81 and all claims

dependent thereon are allowable. Accordingly, Applicants respectfully request withdrawal of the rejection and allowance of claims 82-85.

Claim 87 recites the limitation of "diametrically expanding a wall of a corrugated tubular in a bore such that the wall is deformed about its entire circumference." As previously discussed in contrast to "diametrically expanding a wall of a corrugated tubular," the well lining disclosed in *Simmons* is reshaped without any diametrical expansion. The perimeter length remains constant meaning there is no diametrical expansion of the well lining disclosed in *Simmons*. In addition to a wall of the well lining not being expanded, the wall is also not deformed about its entire circumference but only at U-shaped coupling strips if at all. Therefore, Applicants submit that *Simmons* fails to teach, show or suggest each and every limitation of claim 87. Applicants respectfully submit that claim 87 is allowable and request withdrawal of the rejection and allowance thereof.

### ***Claim Rejections 35 U.S.C. § 103***

Claim 71 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over *Simmons*. Applicant submit that claim 71 is allowable based at least on the traversal presented herein regarding claim 67 from which claim 71 depends.

Claim 37 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over *Simmons* in view of *Ohirano et al* (U.S. Patent No. 6,431,610). In response, Applicants have canceled claim 37 without prejudice thereby obviating the rejection.

Claims 61, 62, 64 and 68 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over *Simmons* in view of *Zifferer* (U.S. Publication No. 2002/0121361). Applicant respectfully traverses the rejection.

As previously discussed with respect to claim 56, *Simmons* fails to disclose rotating the corrugated liner in the bore. *Zifferer* fails to overcome this deficiency. Therefore, Applicants submit that *Simmons* in view of *Zifferer* fails to teach show or suggest each and every element of claim 61. Applicants further submit that claim 61 and claims 62 and 64 dependent thereon are allowable. Accordingly, Applicants respectfully request withdrawal of the rejection and allowance of the claims.

Regarding claim 67 which has been amended to include the limitation of claim 68, Applicants submit that the Examiner's statement "that helical or linear corrugations are equivalent" based on corrugated heat exchanger elements disclosed *Zifferer* fails to provide motivation for the modification of *Simmons*. Any equivalence of corrugated lining in the unrelated field of heat exchanger elements does not imply equivalence as related to the present invention. By contrast, it is Applicants' disclosure that provides benefits of helical corrugations such as the helical corrugations acting in a similar manner as a screw thread to facilitate overcoming a restriction. Therefore, Applicants submit that claim 67 is patentable over *Simmons* in view of *Zifferer*.

Claim 66 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over *Richard et al* (U.S. Patent No. 6,263,972) in view of *Simmons*. Applicants respectfully traverse the rejection.

Claim 66 recites "a reelable downhole tubular, the tubular having a corrugated wall defining selected periodic corrugations with a substantially circumferential component." In *Simmons*, well lining consists of units of fixed length of approximately twenty feet. A tubing disclosed in *Richard et al* has a corrugated shape that is longitudinal for the purpose of obtaining significant expansion volumetrically by changing shape of the tubular from corrugated to rounded. This longitudinally corrugated tubing disclosed in *Richard et al* also permits insertion into smaller wellbores. Applicants submit that there is no motivation to modify *Richard et al* to utilize corrugations with a substantially circumferential component since such a modification would render *Richard et al* unsatisfactory for its intended purposes. Therefore, *Richard et al* in view of *Simmons* fails to render claim 66 obvious. Accordingly, Applicants respectfully submit that claim 66 is allowable and request withdrawal of the rejection and allowance thereof.

### **Conclusion**

The references cited by the Examiner, alone or in combination, do not teach, show, or suggest the invention as claimed. Having addressed all issues set out in the office action, Applicants respectfully submit that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted,



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